IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
AD1 Urban Palm Bay, LLC, 1	Case No. 23-10074 (KBO)
Debtor.	(Joint Administration Requested)

AMENDED² NOTICE OF (I) FILING OF BANKRUPTCY PETITIONS AND RELATED DOCUMENTS AND (II) AGENDA FOR HEARING ON THE INITIAL FIRST DAY MOTIONS SCHEDULED FOR <u>JANUARY 26, 2023, AT 12:00</u> <u>P.M.</u> (ET), BEFORE THE HONORABLE KAREN B. OWENS, UNITED STATES BANKRUPTCY JUDGE FOR THE DISTRICT OF DELAWARE³

THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM AND REQUIRES ALL PARTICIPANTS TO REGISTER TWO HOURS IN ADVANCE.

COURTCALL WILL NOT BE USED TO DIAL IN.

Register in advance for this meeting:

https://debuscourts.zoomgov.com/meeting/register/vJItdeqqrz0oGnqSRY5-Lr-_GCIUi7j9cS8

ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING.

PLEASE TAKE NOTICE that, on January 22, 2023, AD1 Urban Palm Bay, LLC, and its above-captioned affiliates (collectively, the "<u>Debtors</u>") filed the following voluntary petitions (collectively, the "<u>Petitions</u>") for relief under chapter 11 of the of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "<u>Bankruptcy Code</u>"), and related pleadings with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtors continue to operate

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: AD1 Celebration Hotels, LLC (7980); AD1 Daytona Hotels, LLC (7940); AD1 LBV1, LLC (1125); AD1 PB Airport Hotels, LLC (6855); AD1 SW Property Holdings, LLC (2507); AD1 Urban Palm Bay, LLC (3713); AD1 Urban Palm Bay Place, LLC (2385); AD1 Celebration Holdings, LLC (3363); AD1 Daytona Holdings, LLC (2761); AD1 LBV Hotels, LLC (7709); AD1 Palm Beach Airport Hotels, LLC (2187); AD1 Urban Strategy Palm Bay, LLC (9412); and AD1 Urban SW, LLC (6934). The mailing address for each of the Debtors is 1955 Harrison Street, Suite 200, Hollywood, FL 33020.

² This agenda is amended solely for the purposes of providing active hyperlinks.

³ All motions and other pleadings reference herein are available at https://cases.stretto.com/AD1/ or by request to Debtors' proposed counsel (Beth Olivere, paralegal, at 302-467-4247 or beth.olivere@faegredrinker.com).

their business as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PETITIONS AND RELATED PLEADINGS:

- 1. Voluntary Petitions
 - A. AD1 Urban Palm Bay, LLC [Case No. 23-10074] [D.I. 1, 1/22/23]
 - B. AD1 Urban Palm Bay Place, LLC [Case No. 23-10075] [D.I. 1, 1/22/23]
 - C. AD1 Urban Strategy Palm Bay, LLC [Case No. 23-10076] [D.I. 1, 1/22/23]
 - D. AD1 LBV1, LLC [Case No. 23-10077] [D.I. 1, 1/22/23]
 - E. AD1 LBV Hotels, LLC [Case No. 23-10078] [D.I. 1, 1/22/23]
 - F. AD1 SW Property Holdings, LLC [Case No. 23-10079] [D.I. 1, 1/22/23]
 - G. AD1 Urban SW, LLC [Case No. 23-10080] [D.I. 1, 1/22/23]
 - H. AD1 Palm Beach Airport Hotels, LLC [Case No. 23-10081] [D.I. 1, 1/22/23]
 - I. AD1 PB Airport Hotels, LLC [Case No. 23-10082] [D.I. 1, 1/22/23]
 - J. AD1 Celebration Holdings, LLC [Case No. 23-10084] [D.I. 1, 1/22/23]
 - K. AD1 Celebration Hotels, LLC [Case No. 23-10085] [D.I. 1, 1/22/23]
 - L. AD1 Daytona Holdings, LLC [Case No. 23-10086] [D.I. 1, 1/22/23]
 - M. AD1 Daytona Hotels, LLC [Case No. 23-10087] [D.I. 1, 1/22/23]
- 2. Declaration of Alex Fridzon in Support of Debtors' Chapter 11 Petitions and First-Day Motions and Applications [D.I. 16, 1/25/23]⁴

PLEASE TAKE FURTHER NOTICE that a virtual hearing with respect to the following first day motions (collectively, the "<u>First Day Motions</u>"), to the extent set forth below, is scheduled for January 26, 2023, at 12:00 p.m. (Eastern Time) (the "<u>First Day Hearing</u>") before the Honorable Karen B. Owens, United States Bankruptcy Judge for the District of Delaware.

FIRST DAY MOTIONS GOING FORWARD:

3. Debtors' Motion for an Order Authorizing the Joint Administration of the Debtors' Chapter 11 Cases for Procedural Purposes Only [D.I. 8, 1/24/23]

Status: This matter will be going forward.

4. Debtors' Application for Appointment of Stretto, Inc. as Claims and Noticing Agent [D.I. 9, 1/24/23]

Status: This matter will be going forward.

_

⁴ The location of this declarant is Miami, FL.

5. Debtors' Motion for an Interim Order Granting (I) Authority to (A) Continue Using Existing Bank Accounts, Business Forms, Cash Management System, and Pay All Fees Related Thereto and (B) Implement Ordinary Course Changes to Cash Management System, Including Opening and Closing Bank Accounts; (II) a Waiver of the Requirements of Section 345(b) of the Bankruptcy Code; and (III) Related Relief [D.I. 10, 1/25/23]

Status: This matter will be going forward on an interim basis.

6. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) Critical Vendors and Service Providers and (B) Certain Vendors Entitled to Administrative Expense Status Under Section 503(b)(9) of the Bankruptcy Code and (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto [D.I. 11, 1/25/23]

Status: This matter will be going forward on an interim basis.

7. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Use of Cash Collateral and Affording Adequate Protection; (II) Modifying Automatic Stay; (III) Scheduling Final Hearing; and (IV) Granting Related Relief [D.I. 15, 1/25/23]

Status: This matter will be going forward on an interim basis.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions may be made at the First Day Hearing.

[Signature Page Follows]

Dated: Wilmington, Delaware January 25, 2023

FAEGRE DRINKER BIDDLE & REATH LLP

/s/ Ian J. Bambrick

Ian J. Bambrick (No. 5455) Katharina Earle (No.6348) 222 Delaware Ave. Suite 1410

Wilmington, DE 19801 Tel: (302) 467-4200 Fax: (302) 467-4201

ian.bambrick@faegredrinker.com katharina.earle@ faegredrinker.com

Scott F. Gautier (admitted *pro hac vice*) Maria J. Cho (admitted *pro hac vice*) 1800 Century Park East, Suite 1500 Los Angeles, CA 90067

Tel: (310) 203-4000 Fax: (310) 229-1285

scott.gautier@faegredrinker.com maria.cho@faegredrinker.com

Michael T. Gustafson (admitted *pro hac vice*) 320 South Canal Street, Suite 3300 Chicago, Ill 60606

Tel: (312)569-1000 Fax: (312) 569-3000

mike.gustafson@faegredrinker.com

Proposed Counsel to the Debtors and Debtors in Possession